

TEAL MONTGOMERY & HENDERSON

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Attorneys for Plaintiff, Jasper Gonzales, by his
Guardian Ad Litem, Jenna Gonzales

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JASPER GONZALES, by his Guardian Ad
Litem, JENNA GONZALES,

Plaintiff,

vs.

RICK SIMONS, FURTADO, JASPOVICE &
SIMONS, A LAW CORPORATION, SUTTER
BAY HOSPITALS dba SUTTER MEDICAL
CENTER OF SANTA ROSA, and DOES 1
through 20,

Defendants.

SUTTER BAY HOSPITALS dba SUTTER
MEDICAL CENTER OF SANTA ROSA,

Third Party Complainant,

vs.

UNITED STATES OF AMERICA, and ROES
1-10,

Third Party Defendants.

Civil Action No. C11-04319 SC

**STIPULATION TO SETTLEMENT AND
~~PROPOSED~~ ORDER**

The parties, by and through their expected counsel of record hereby stipulate as follows:

1. All parties to this action have settled their respective claims.

2. Because Plaintiff, Jasper Gonzales, is a minor represented through his Guardian Ad Litem, Jenna Gonzales, Plaintiff must present to the Court for approval the settlement agreement reached in this case.

3. The parties are currently in the process of preparing the necessary settlement documentation and the petition for approval of the settlement. This process includes the creation of a special needs trust and the securing of a lifetime annuity to be purchased with part of the settlement funds.

4. Plaintiff will need additional time to complete the necessary arrangements before presenting to the Court the final settlement for consideration and approval.

5. The parties hereby stipulate to Plaintiff presenting the Court with a petition for approval of the settlement on March 15, 2013 at 10:00 a.m. in Courtroom 1.

6. The parties stipulate to, and request the Court issue an order, vacating all other pending dates, and setting the hearing to consider the settlement agreement on March 15, 2013 at 10:00 a.m. in Courtroom 1.

IT IS SO STIPULATED:

TEAL MONTGOMERY & HENDERSON

DATED: February 26, 2013

By: /S/
Michael S. Henderson
Attorney for Plaintiff, Jasper Gonzales

MURPHY PEARSON BRADLEY & FEENEY

DATED: February 26, 2013

By: /S/
Arthur J. Harris
Attorney for Defendants Rick Simons and
Furtado, Jaspovice & Simons

LA FOLLETTE, JOHNSON, DE HAAS,
FESLER & AMES

DATED: February 26, 2013

By: _____/S/_____
Cameron Whitehead
Attorney for Defendant Sutter West Bay
Hospitals, dba Sutter Medical Center of
Santa Rosa

U.S. ATTORNEY'S OFFICE

DATED: February 26, 2013

By: _____/S/_____
Jennifer S. Wang
Attorney for Third Party Defendant
United States of America

~~[PROPOSED]~~ ORDER

Based upon the stipulation of the parties set forth above, and good cause appearing
therefor, the Court hereby orders as follows:

1. A hearing to consider the settlement agreement reached between the parties is set
for March 15, 2013 at 10:00 a.m. in Courtroom 1.
2. All other pending dates are vacated.

DATED: February 27, 2013

